

**IN THE UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

2005 JAN 30 A 9:24

**JACKIE WHITE,**

**Plaintiff,**

**VS.**

**MPW INDUSTRIAL SERVICES, INC.**

**Defendant.**

**CASE NO. 1:06cv82-MHT**

**JURISDICTION**

Jurisdiction in this action is based on federal statutes 42 U.S.C. 2000 et. seq., and 42 U.S.C. 1981a. All alleged incidents occurred in Houston County, Alabama. Plaintiff filed her charge with the Alabama Equal Employment Opportunity Commission on or about May 20, 2005. Plaintiff received her right to sue letter on or about October 31, 2005.

**SUMMARY OF THE PARTIES**

1. Plaintiff, Jackie White (hereinafter referred to as "White" does reside in Houston County, Alabama, and did at all relevant times during the actions complained of herein.
2. Defendant, MPW Industrial Services, Inc. (hereinafter referred to as "MPW") is an Ohio Corporation actively doing business in Houston County, Alabama.

**SUMMARY OF THE FACTS**

3. Plaintiff White was employed as a district sales representative with MPW in Dothan, Alabama.
4. White's supervisor Chuck Munsey made sexually related advances towards White in the form of lewd comments. White continually refused these advances. Munsey's

actions were constant and repeated, and continued through and during the time that White was employed by the Defendant.

5. White was subjected to other male employees' lewd and sexual comments as well, which were constant and repeated, and continued through and during the time that White was terminated by the Defendant.
6. Munsey and other male employees of the Defendant further engaged in inappropriate sexual behavior toward White during the time she was employed by Defendant by inquiring about having sexual relations with them.
7. White was terminated on December 3, 2004 by the Defendant.

### **COUNT I**

#### **SEXUAL HARASSMENT/HOSTILE WORK ENVIRONMENT**

8. Plaintiff White adopts and re-alleges all prior paragraphs as if set out here in full.
9. Plaintiff White would assert that the corporate Defendant has violated 42 U.S.C. 2000 et. seq. in that she has been sexually harassed by her **superior/co-worker**, in violation of Federal Law, by subjecting her to a sexually hostile work environment.

WHEREFORE, Plaintiff White demands judgment against Defendant for such sums as a jury may award, including both compensatory and punitive damages, as well as all attorney's fees and costs.

### **COUNT II**

10. Plaintiff White adopts and re-alleges all prior paragraphs as if set out here in full.
11. Plaintiff White further contends that Munsey did on several occasions attempt to renew a relationship with Plaintiff White, the two parties who had many years earlier,

prior to her employment with the Defendant, had a relationship together. Plaintiff White refused those advancements and suggestions, and as a result, Mr. Munsey caused White's employment to be terminated. White contends that Munsey's actions resulted in a quid pro quo termination of her employment because of his mis-training and mis-assignments of Plaintiff White, which he passed on to White's new supervisor, which resulted in that supervisor terminating White before the end of her probation.

WHEREFORE, Plaintiff White demands judgment against Defendant for such sums as a jury may award for both compensatory and punitive damages, as well as attorney's fees and costs.

### **COUNT III**

#### **RETALIATION**

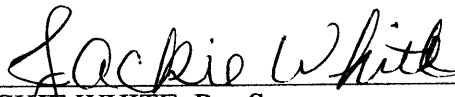
12. Plaintiff White adopts and re-alleges all prior paragraphs as if set out here in full. White would assert that the Defendant has violated 42 U.S.C. 1981(a), in that the Defendant failed to take prompt and remedial measures to prohibit sexual harassment, and then retaliated against her, both through her immediate supervisor and through the corporate Defendant, by failing to allow her full-time regular employment.

WHEREFORE, Plaintiff White demands judgment against Defendant for such sums as a jury may award for both compensatory and punitive damages, as well as attorney's fees and costs.

DATED this 27<sup>th</sup> day of January, 2006.

Jackie White  
JACKIE WHITE, Pro Se

**PLAINTIFF DEMANDS TRIAL BY JURY**

A handwritten signature in cursive script that reads "Jackie White". The signature is written in black ink and is positioned above a horizontal line.

JACKIE WHITE, Pro Se  
721 Blair Avenue  
Hampton, VA 23661

**SERVE DEFENDANT MPW INDUSTRIAL SERVICES, INC. AT:**

MPW Industrial Services, Inc.  
C/O National Corporate Research, Ltd.  
2527 College Street  
Montgomery, AL 36104